

1 **Mark J. Werksman, Esq. - CSB No. 120767**  
2 **LAW OFFICES OF MARK J. WERKSMAN**  
3 **801 South Figueroa Street, 11<sup>th</sup> Floor**  
4 **Los Angeles, California 90017**  
5 **Tel: (213) 688-0460 /Fax: (213) 624-1942**

\*efiled 4/5/07

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7  
8 Attorneys for Defendant  
9 Alexander Dzhuga

10  
11  
12 **UNITED STATES DISTRICT COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**  
14

15 THE UNITED STATES OF  
16 AMERICA,

17 Plaintiff,

18 v.

19 ALEXANDER DZHUGA,  
20 et al.

21 Defendant.  
22

CASE NO. CR-05-00589-JF

**STIPULATION TO CONTINUE  
SENTENCING HEARING**

23 **TO: THE HONORABLE HONORABLE JEREMY FOGEL, JUDGE OF**  
24 **THE UNITED STATES DISTRICT COURT AND TO ASSISTANT UNITED**  
25 **STATES ATTORNEY RICHARD C. CHENG:**

26 Defendants Alexander Dhuzga, Vladimir Semenov, Leonid Dzhuga, Natalia  
27 Stadnik, and Armond Tollett, II, by and through their respective counsels of  
28 record, and the United States of America, by and through its representative,  
Assistant United States Attorney Richard C. Cheng, hereby agree and stipulate  
that the Sentencing Hearing currently set for April 18, 2007, be continued to June  
18, 2007 at 10:00 a.m.

///  
///

MAR-21-2007 10:10

Received

Mar 21 2007 09:40am

P.03

1 The basis for the requested continuance is defense counsel needs additional  
 2 time to respond to the Pre-sentence Report.

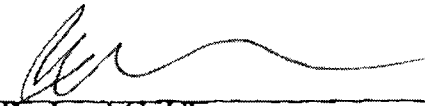
3  
 4 **IT IS SO STIPULATED**

5 The parties agree and stipulate that defendant's sentencing, currently  
 6 set for April 18, 2007, be continued until June 18, 2007, 2007 at 10:00 a.m., or  
 7 such other date as is available for the Court.

8 Defendant's counsel has discussed the proposed continuance with  
 9 defendant who concurs with this request and the reasons stated therefore.

10  
 11 Dated: March 21, 2007

United States Attorney  
 Kevin V. Ryan

12  
 13 By:   
 14 Richard C. Cheng  
 15 Assistant United States Attorney

16 Dated: March \_\_, 2007

17 By: \_\_\_\_\_  
 18 Mark Werksman  
 19 Attorney for Defendant  
 20 Alexander Dzhuga

21 Dated: March \_\_, 2007

22 By: \_\_\_\_\_  
 23 Geoffrey A. Braun  
 24 Attorney for Defendant  
 25 Vladimir Semenov

26 Dated: March \_\_, 2007

27 By: \_\_\_\_\_  
 28 Dmitry Gurovich  
 Attorney for Defendant  
 Leonid Dzhuga

Dated: March \_\_, 2007

By: \_\_\_\_\_  
 Elon Berk

03/21/2007 10:39 2136241942

MARK WERKSMAN

PAGE 03/04

1 The basis for the requested continuance is defense counsel needs additional  
 2 time to respond to the Pre-sentence Report.

3  
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 9 defendant who concurs with this request and the reasons stated therefore.

10  
 11 Dated: March \_\_, 2007

United States Attorney  
 Kevin V. Ryan

12  
 13  
 14 By: Richard C. Cheng  
 Assistant United States Attorney

15  
 16 Dated: March 23, 2007

17 By: Mark Werksman  
 Mark Werksman  
 Attorney for Defendant  
 Alexander Dzuhga

18  
 19  
 20 Dated: March \_\_, 2007

21 By: Geoffrey A. Braun  
 Attorney for Defendant  
 Vladimir Semenov

22  
 23  
 24 Dated: March 27, 2007

25 By: Dmitry Gurovich  
 Attorney for Defendant  
 Leonid Dzuhga

26  
 27 Dated: March \_\_, 2007

28 By: Elon Berk

Mark Werksman  
 801 S. Figueroa St.,  
 11th Floor  
 L.A., CA 90017

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2 time to respond to the Pre-sentence Report.

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10  
11 Dated: March \_\_\_, 2007

United States Attorney  
Kevin V. Ryan

12  
13 By: \_\_\_\_\_  
14 Richard C. Cheng  
15 Assistant United States Attorney

16 Dated: March \_\_\_, 2007

17 By: \_\_\_\_\_  
18 Mark Werksman  
19 Attorney for Defendant  
Alexander Dzhuga

20 Dated: March 21, 2007

21 By: /s/ Geoffrey A. Braun  
22 Geoffrey A. Braun  
23 Attorney for Defendant  
Vladimir Semenov

24 Dated: March \_\_\_, 2007

25 By: \_\_\_\_\_  
26 Dmitry Gurovich  
27 Attorney for Defendant  
Leonid Dzhuga  
28

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MARK WERKSMAN

PAGE 03/04

The basis for the requested continuance is defense counsel needs additional time to respond to the Pre-sentence Report.

**IT IS SO STIPULATED**

The parties agree and stipulate that defendant's sentencing, currently set for April 18, 2007, be continued until June 18, 2007, 2007 at 10:00 a.m., or such other date as is available for the Court.

Defendant's counsel has discussed the proposed continuance with defendant who concurs with this request and the reasons stated therefore.

Dated: March \_\_, 2007

United States Attorney  
Kevin V. Ryan

By: \_\_\_\_\_

Richard C. Cheng  
Assistant United States Attorney

Dated: March \_\_, 2007

By: \_\_\_\_\_

Mark Werksman  
Attorney for Defendant  
Alexander Dzuhga

Dated: March \_\_, 2007

By: \_\_\_\_\_

Geoffrey A. Braun  
Attorney for Defendant  
Vladimir Semenov

Dated: March 24, 2007

By: \_\_\_\_\_

Dmitry Gurovich  
Attorney for Defendant  
Leonid Dzuhga

Dated: March 26, 2007

By: \_\_\_\_\_

Elon Berk

Mark Werksman  
801 S. Figueroa St.  
11th Floor  
L.A., CA 90017

1 Dated: March \_\_\_, 2007

By: \_\_\_\_\_  
Elon Berk  
Attorney for Defendant  
Natalia Stadnik

5 Dated: March \_\_\_, 2007

By: /s/ William S. Kroger, Jr.  
William S. Kroger, Jr.  
Attorney for Defendant  
Armond Tollett, II

8  
9 **~~PROPOSED~~ ORDER**

10 **THE COURT HEREBY** continues the Sentencing hearing in this matter  
11 20, JF  
12 currently set for April 18, 2007, at 10:00 a.m. to June 18, 2007, at 10:00 a.m.

13 **IT IS SO ORDERED** As Modified Above.

16  
17 April 4  
18 Dated: ~~March~~ \_\_\_, 2007

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18 HONORABLE JEREMY FOGEL  
19 United States District Judge  
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**(PROOF OF SERVICE - 1013A(3), 2015.5 C.C.P.)**

**STATE OF CALIFORNIA** )  
**COUNTY OF LOS ANGELES** ) ss.

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 801 South Figueroa Street, 11<sup>th</sup> Floor, Los Angeles, California 90017.

On March 27, 2007, I served the foregoing documents described as: **STIPULATION TO CONTINUE SENTENCING HEARING** on interested parties in this matter by placing a true copy in a sealed envelope addressed as follows:

Richard C. Cheng  
 Assistant United States Attorney  
 150 Almaden Street  
 San Jose, CA 95113  
 Fax No. (408) 535-5066  
*Attorney for United States of America*

Geoffrey A Braun, Esq.  
 181 Devine Street  
 San Jose, CA 95110  
*Attorney for Vladimir A. Semenov*

Dmitry Y. Gurovich, Esq.  
 Gurovich & Associates  
 15250 Ventura Blvd., Ste. PH-1220  
 Sherman Oaks, CA 91403  
*Attorney for Leonid Dzhuga*

Elon Berk, Esq.  
 Gurovich & Associates  
 15250 Ventura Blvd., Ste. PH-1220  
 Sherman Oaks, CA 91403  
*Attorney for Natalia Stadnik*

William Kroger, Jr., Esq.  
 8888 Olympic Blvd.  
 Beverly Hills, CA 90211  
 (323) 655-5700  
*Attorney for Armond Tollett, II*

Jaime A. Carranza  
 Pretrial Officer  
 280 S. 1st Street, Ste. 1150  
 San Jose, CA 95113  
 Fax No. (408) 535-5227

(BY MAIL)   X   I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service made pursuant to C.C.P. § 1013(a) should be presumed invalid if postal cancellation date of postage meter date is more than on day after date of deposit for mailing in affidavit.

(FEDERAL)   X   I declare that I am employed in the office of a member of the bar of this court at whose discretion the service was made.

Executed on this 27<sup>th</sup> day of March 2007, in Los Angeles, California.

  
 Martha Rodriguez